

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FRED NEKOUUE, individually,

Plaintiff,

vs.

GIOVANNI'S RESTAURANT, INC.,  
a Missouri corporation,

Defendant.

Case No. 4:18-cv-01915-RWS

*[Handwritten signature]*  
*[Handwritten signature]*  
4/5/19

**JOINT STIPULATION OF DISMISSAL WITHOUT PREJUDICE**

Plaintiff and Defendant GIOVANNI'S RESTAURANT, INC. by and through their respective counsel, hereby stipulate to the dismissal of this action against Defendant GIOVANNI'S RESTAURANT, INC. without prejudice pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) as the Defendant has identified in its Answer another family entity, Gabriele Family, LLC, a Missouri limited liability company, that is the owner and operator of the subject restaurant. Each party to bear its own costs and attorney fees.

DATE: April 4, 2019

Respectfully submitted,

s/Robert J. Vincze

Robert J. Vincze (MO # 37687)  
Law Offices of Robert J. Vincze  
PO Box 792  
Andover, Kansas 67002  
Phone: 303-204-8207  
Email: [vinczelaw@att.net](mailto:vinczelaw@att.net)

*Attorney for Plaintiff Fred Nekouee*

and

s/Neil J. Bruntrager

Neil J. Bruntrager (MO #29688)

Charles H. Billings (MO #26789)

Bruntrager & Billings, P.C.

225 S. Meramec Ave., Suite 1200

Clayton, Missouri 63105

Phone: 314-646-0066

Email: [njb@law-stl.com](mailto:njb@law-stl.com)

*Attorneys for Defendant Giovanni's Restaurant,  
Inc.*